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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CHRISTIAN CLAUSTRO,  
  
Defendant.

CASE NO. 1:24-CR-00039-JLT-SKO  
  
STIPULATION AND ORDER TO CONTINUE  
STATUS CONFERENCE

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney and Robert L. Veneman-Hughes, Assistant U.S. Attorney and and Erin Snider, attorney for defendant Christian CLAUSTRO, that the status conference set for April 17, 2024, at 1:00 pm before the Honorable Sheila K. Oberto be continued to May 15, 2024 at 1:00 p.m.

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. The parties need additional time to further investigate/explore matters related to resolving the case or setting a trial date.

2. By this stipulation, defendant now moves to continue the status conference, and to exclude time from April 17, 2024, to May 15, 2024.

3. The parties agree and stipulate, and request that the Court find the following:

1           a)     The government has represented that the discovery associated with this case  
2 includes investigative reports, and related documents, photographs, etc., in electronic form. All  
3 of this discovery has been either produced directly to counsel and/or made available for  
4 inspection and copying. Defense would like additional time to review discovery, and investigate  
5 the foundation for a resolution by plea or trial further.

6           b)     The government does not object to the continuance.

7           c)     An ends-of-justice delay is particularly apt in this case because:

- 8               • Defendant needs additional time to review discovery, and conduct additional  
9 investigation; and  
10  
11              • The parties need additional time to investigate/explore matters related to  
12 proceeding via plea or trial.

13          d)     Based on the above-stated findings, the ends of justice served by continuing the  
14 case as requested outweigh the interest of the public and the defendant in a trial within the  
15 original date prescribed by the Speedy Trial Act.

16          e)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of April 17, 2024 to May 15, 2024,  
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) because  
19 it results from a continuance granted by the Court at defendants' request on the basis of the  
20 Court's finding that the ends of justice served by taking such action outweigh the best interest of  
21 the public and the defendants in a speedy trial.

22                   **[Remainder of page intentionally left blank.]**  
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3 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
4 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
5 must commence.

6  
7 Dated: April 10, 2024

Respectfully submitted,

8 PHILLIP A. TALBERT  
9 United States Attorney

10 By /s/ Robert L. Veneman-Hughes  
11 ROBERT L. VENEMAN-HUGHES  
Assistant United States Attorney

12 Dated: April 10, 2024

13 /s/ Erin Snider  
14 ERIN SNIDER  
Attorney for Defendant Christian Claustro

15 ORDER

16 IT IS SO ORDERED.

17  
18  
19 Dated: 4/10/2024

20 Sheila K. Oberto  
HONORABLE SHEILA K. OBERTO  
United States Magistrate Court Judge